

Gary F. Eisenberg, Esq.  
HERRICK, FEINSTEIN LLP  
One Gateway Center  
Newark, New Jersey 07102  
(973) 274-2000  
Attorneys for Cherokee Equities, LLC

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In Re:

WALSH SECURITIES, INC.,

Debtor.

Case No.: 10-44845 (NLW)

Hon. Novalyn L. Winfield

Hearing Date: April 4, 2011, at 9:00 a.m.

Oral Argument Requested

**NOTICE OF MOTION**  
**FOR RELIEF FROM AUTOMATIC STAY**

**PLEASE TAKE NOTICE** that the undersigned counsel for Cherokee Equities, LLC (“Lender”) on April 4, 2011 at 9:00 a.m. or as soon thereafter as counsel may be heard will move before the Honorable Novalyn L. Winfield, United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Martin Luther King, Jr. Federal Building, 50 Walnut Street, 3rd Floor, Newark, N.J. 07102, Courtroom 3D, for the entry of an Order modifying the automatic stay (the “Motion”) to the same extent as in Case No. 10-45765NLW, and granting any other relief the Court deems just and appropriate.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned relies upon the accompanying Memorandum of Law and Certification of Jay Wolfkind, dated March 13, 2011. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought by the Motion must be in writing and must be filed with the Clerk of the United States Bankruptcy Court at the above address and served upon Herrick, Feinstein LLP, One Gateway Center, Newark, New Jersey 07102, Attn: Gary F. Eisenberg, in accordance with the Local Rules of Bankruptcy Procedure of the Bankruptcy Court for the District of New Jersey and Order of this Court.

PLEASE TAKE FURTHER NOTICE that unless objections to the Motion are timely filed and served, the Motion shall be deemed uncontested and the Court may enter the proposed Order without a hearing.

PLEASE TAKE FURTHER NOTICE that the Lender requests oral argument on the return date of the Motion.

Dated: March 14, 2011

Respectfully submitted,

**HERRICK, FEINSTEIN LLP**

/s/ Gary F. Eisenberg  
Gary F. Eisenberg  
One Gateway Center  
Newark, New Jersey 07012  
Tel No.: (973) 274-2000  
Fax No.: (973) 274-2500  
Attorneys for Cherokee Equities, LLC

**SERVICE LIST**

**VIA ECF:**

United States Trustee's Office  
One Newark Center, Suite 2100  
Newark, NJ 07102

**VIA ECF and REG. MAIL**

Daniel M. Stolz, Esq.  
Wasserman, Jurista & Stoltz  
225 Millburn Avenue, Suite 207  
Millburn, NJ 07041  
Counsel for the Debtor